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*Attorneys for Plaintiff*, JOHN DOBBINS

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JOHN DOBBINS; individually and as  
successor in interest to JENNIFER  
DOBBINS, Decedent,

Plaintiff,

vs.

COUNTY OF RIVERSIDE; JOHN  
BARTO; and DOES 1-10, inclusive,

Defendants.

Case No.: 5:25-cv-01444-JGB-DTB

*[Honorable Jesus G. Bernal  
Magistrate Judge David T. Bristow]*

**REQUEST FOR PLAINTIFF'S  
ATTORNEY MARCEL F. SINCICH  
TO APPEAR REMOTELY AT THE  
MOTION TO STAY HEARING IN  
LIEU OF LEAD TRIAL COUNSEL**

Date: November 24, 2025  
Time: 9:00 a.m.  
Crtrm.: 1

**TO THE HONORABLE COURT, AND ALL PARTIES THROUGH THEIR  
ATTORNEYS OF RECORD:**

Plaintiff John Dobbins, by and through his attorneys of record, hereby  
respectfully requests an order permitting his counsel Marcel F. Sincich to appear  
remotely on his behalf in lieu of lead trial counsel, Dale K. Galipo, at the Motion to

1 Stay hearing on November 24, 2025. Plaintiff submits that good cause exists to  
2 allow Mr. Sincich to appear remotely in place of Mr. Galipo at the Motion to Stay  
3 hearing because Mr. Sincich resides out of state and Mr. Galipo will be engaged in  
4 trial in Sacramento in the matter of *Quair v. County of Kings*, Eastern District Court  
5 Case No. 1:20-cv-1793.

6 For these reasons, Plaintiff respectfully requests that the Court issue an order  
7 permitting Mr. Sincich to appear remotely at the Motion to Stay hearing remotely on  
8 November 24, 2025, in lieu of Plaintiff's lead trial counsel Mr. Galipo.

9  
10 DATED: November 10, 2025

LAW OFFICES OF DALE K. GALIPO

11  
12 By: 

13 Dale K. Galipo

14 Marcel F. Sincich

15 *Attorneys for Plaintiff, John Dobbins*  
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